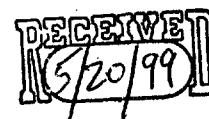


**I N F I N I T Y<sup>2</sup>**

I n c o r p o r a t e d

4420 99 MAY 26 A9 50

May 13, 1999



Office of Special Nutritional (HFS-450)  
Center for Food Safety and Applied Nutrition  
Food & Drug Administration  
200 "C" Street, SW  
Washington, D.C. 20204

**RE: NOTIFICATION OF STATEMENTS ON  
DIETARY SUPPLEMENT LABELS  
PER DSHEA REGULATIONS**

Infinity<sup>2</sup>, Inc. (address listed above), a U.S.-based distributor of nutritional supplements, is making the following nutritional support statements on its product labels:

Insure Plus

"If you're looking for a direct path to getting the nutrients your body needs to function at its best, choose Infinity<sup>2</sup>'s 100% natural whole food vitamin source, Insure Plus. At the heart of Infinity<sup>2</sup>'s Insure Plus is a proprietary Chelate Activated Enzyme Delivery System (CA<sup>e</sup>DS) – a breakthrough formula that guarantees maximum effectiveness.

Digest-A-Meal

Proper food digestion is the key to maximizing your energy levels and getting the most out of each meal. To replenish your body with vital enzymes and to support vitality and overall health, turn to Infinity<sup>2</sup>'s 100% natural Digest-A-Meal. At the heart of Infinity<sup>2</sup>'s Digest-A-Meal is a proprietary Chelate Activated Enzyme Delivery System (CA<sup>e</sup>DS) – a breakthrough formula that guarantees maximum effectiveness.

Lipo-Chromizyme

Instead of letting fats and sugars increase your pant size, why not make them work to increase your energy? With Infinity<sup>2</sup>'s Lipo-chromizyme fat-digesting formula, you can do just that. At the heart of Infinity<sup>2</sup>'s Lipo-chromizyme is a proprietary Chelate Activated Enzyme Delivery System (CA<sup>e</sup>DS) – a breakthrough formula that guarantees maximum effectiveness.

07S-0162

Corporate Headquarters

LET 3616

### Life Force Super Antioxidant

Pollution, toxins and even stress can accelerate the formation of free radicals in the body, which have been linked to serious health risks. Protect yourself with Infinity<sup>2</sup>'s 100% natural Life Force Super Antioxidant. At the heart of Infinity<sup>2</sup>'s Life Force Super Antioxidant is a proprietary Chelate Activated Enzyme Delivery System (CA<sup>e</sup>DS) – a breakthrough formula that guarantees maximum effectiveness.

### Total Flora Support

Every healthy immune system requires a sufficient amount of "friendly" bacteria. Strengthen your body's defenses and support your overall health with Infinity<sup>2</sup>'s Total Flora Support. At the heart of Infinity<sup>2</sup>'s Total Flora Support is a proprietary Chelate Activated Enzyme Delivery System (CA<sup>e</sup>DS) – a breakthrough formula that guarantees maximum effectiveness.

### Cytolyse

The muscle and joint discomfort associated with an active lifestyle is hard to ignore. For relief, try Infinity<sup>2</sup>'s natural Cytolyse. At the heart of Infinity<sup>2</sup>'s Cytolyse is a proprietary Chelate Activated Enzyme Delivery System (CA<sup>e</sup>DS) – a breakthrough formula that guarantees maximum effectiveness.

### Transportox

It isn't easy for the human body to filter the heavy metals and toxic chemicals it's exposed to on a daily basis. Give your body the extra help it needs to battle these toxins with Infinity<sup>2</sup>'s natural Transportox. At the heart of Transportox is a proprietary Chelate Activated Enzyme Delivery System (CA<sup>e</sup>DS) – a breakthrough formula that guarantees maximum effectiveness.

### Total Body Flora

The cornerstones of longevity are a strong, healthy immune system and a digestive system that performs properly. Show your body that you value these two functions by reaching for Infinity<sup>2</sup>'s natural Total Body Flora. At the heart of Infinity<sup>2</sup>'s Total Body Flora is a proprietary Chelate Activated Enzyme Delivery System (CA<sup>e</sup>DS) – a breakthrough formula that guarantees maximum effectiveness.

### Orthocol

A healthy liver promotes the effective utilization of fat and the disposal of toxins. Help your liver function at its best with Infinity<sup>2</sup>'s natural Orthocol. At the heart of Infinity<sup>2</sup>'s Orthocol is a proprietary Chelate Activated Enzyme Delivery System (CA<sup>e</sup>DS) – a breakthrough formula that guarantees maximum effectiveness.

### Ferroflora

For some women and men, failure to maintain proper iron levels and the ill effects it brings—fatigue and low stamina—are all too common. To replenish your body's supply of this vital nutrient, choose Infinity<sup>2</sup>'s natural Ferroflora. At the heart of Infinity<sup>2</sup>'s Ferroflora is a proprietary Chelate Activated Enzyme Delivery System (CA<sup>e</sup>DS) – a breakthrough formula that guarantees maximum effectiveness.

### Cell Balance

Monthly hormonal imbalances can bring a host of uncomfortable symptoms. For relief, turn to Infinity<sup>2</sup>'s natural Cell Balance. At the heart of Infinity<sup>2</sup>'s Cell Balance is a proprietary Chelate Activated Enzyme Delivery System (CA<sup>e</sup>DS) – a breakthrough formula that guarantees maximum effectiveness.

### Vital Charge

In today's hectic world, stress is a normal part of daily life, but the negative effects don't have to be. Maintain focus and protect your health with Infinity<sup>2</sup>'s 100% natural Vital Charge. At the heart of Infinity<sup>2</sup>'s Vital Charge is a proprietary Chelate Activated Enzyme Delivery System (CA<sup>e</sup>DS) – a breakthrough formula that guarantees maximum effectiveness.

### Ginkgo Biloba with CA<sup>e</sup>DS

For sharper mental alertness and improved memory, turn to Infinity<sup>2</sup>'s 100% natural Ginkgo Biloba with CA<sup>e</sup>DS. At the heart of Infinity<sup>2</sup>'s Ginkgo Biloba is a proprietary Chelate Activated Enzyme Delivery System (CA<sup>e</sup>DS) – a breakthrough formula that guarantees maximum effectiveness.

### Garlic with CA<sup>e</sup>DS

A sound heart and healthy cholesterol levels are the key ingredients to longevity. To maximize these functions, turn to Infinity<sup>2</sup>'s 100% natural Garlic with CA<sup>e</sup>DS. At the heart of Infinity<sup>2</sup>'s Garlic is a proprietary Chelate Activated Enzyme Delivery System (CA<sup>e</sup>DS) – a breakthrough formula that guarantees maximum effectiveness.

### St. John's Wort with CA<sup>e</sup>DS

When you need a hand in dealing with the emotional upset caused by disappointments and circumstances of life, turn to Infinity<sup>2</sup>'s 100% natural St. John Wort with CA<sup>e</sup>DS. At the heart of Infinity<sup>2</sup>'s St. John's Wort is a proprietary Chelate Activated Enzyme Delivery System (CA<sup>e</sup>DS) – a breakthrough formula that guarantees maximum effectiveness.

### Korean Ginseng with CA<sup>e</sup>DS

For natural energy throughout the day, turn to Infinity<sup>2</sup>'s 100% natural Korean Ginseng with CA<sup>e</sup>DS. At the heart of Infinity<sup>2</sup>'s Korean Ginseng is a proprietary Chelate Activated Enzyme Delivery System (CA<sup>e</sup>DS) – a breakthrough formula that guarantees maximum effectiveness.

### Saw Palmetto with CA<sup>e</sup>DS

For some men over 40, and most men over 50, prostate health is an issue that can't be ignored. To assist overall prostate health, turn to Infinity<sup>2</sup>'s 100% natural Saw Palmetto with CA<sup>e</sup>DS. At the heart of Infinity<sup>2</sup>'s Saw Palmetto is a proprietary Chelate Activated Enzyme Delivery System (CA<sup>e</sup>DS) – a breakthrough formula that guarantees maximum effectiveness.

### Kava Kava with CA<sup>e</sup>DS

Everyday life can be hard to handle. To relieve nervous anxiety, reduce stress and promote restfulness in the body, turn to Infinity<sup>2</sup>'s 100% natural Kava Kava with CA<sup>e</sup>DS. At the heart of Infinity<sup>2</sup>'s Kava Kava is a proprietary Chelate Activated Enzyme Delivery System (CA<sup>e</sup>DS) – a breakthrough formula that guarantees maximum effectiveness.

### Echinacea with CA<sup>e</sup>DS

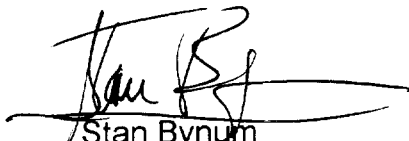
For those times when your body's natural defenses need strengthening, turn to Infinity<sup>2</sup>'s 100% natural Echinacea with CA<sup>e</sup>DS. At the heart of Echinacea is a proprietary Chelate Activated Enzyme Delivery System (CA<sup>e</sup>DS) – a breakthrough formula that guarantees maximum effectiveness.

### ImmunePlus with Colostrum

A healthy immune system is the key to total health. Infinity<sup>2</sup>'s ImmunePlus is a revolutionary immune system enhancement formula that utilizes the unique "immune transfer factors" of Colostrum and other ingredients to provide a foundation for total immune system health. At the heart of Infinity<sup>2</sup>'s ImmunePlus with Colostrum is a proprietary Chelate Activated Enzyme Delivery System (CA<sup>e</sup>DS) – a breakthrough formula that guarantees maximum effectiveness.

I certify that the information presented and contained in this notice regarding Infinity<sup>2</sup>, Inc. dietary supplement labels is complete and accurate, and that these statements are truthful and not misleading.

Respectfully,

A handwritten signature in black ink, appearing to read "Stan Bynum", with a long horizontal flourish extending to the right.

Stan Bynum  
Senior Director  
Research and Development

SB/jm